

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

INTERNATIONAL BUSINESS MACHINES CORPORATION,	)	
	)	
	)	
Plaintiff,	)	C.A. No. 22-590-GBW
	)	
v.	)	<b>JURY TRIAL DEMANDED</b>
	)	
ZYNGA INC.,	)	
	)	
Defendant.	)	

**PLAINTIFF IBM’S MOTION TO EXCLUDE EXPERT TESTIMONY OF  
MR. DOUGLAS KIDDER**

Plaintiff International Business Machines Corporation (“IBM”), by and through its undersigned counsel, respectfully requests this Court exclude Mr. Kidder’s opinions regarding the amounts of IBM’s cross-license agreements. The grounds for IBM’s Motion to Exclude are set forth in its Opening Brief filed contemporaneously herewith. The parties have met and conferred on IBM’s Motion To Exclude per Local Rule 7.1.1.

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Respectfully submitted,

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